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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 John Noble,

12 Plaintiff,

13 v.

14 The Union Bank of California
15 Long Term Disability Benefits Plan,

16 Defendant.
17

No: C 08-00115 SI

**STIPULATION AND [PROPOSED]
ORDER RE: CASE MANAGEMENT
DATES**

18 The parties in the above-captioned matter, through their respective attorneys of
19 record, enter into the following stipulation and request the Court to enter an order
20 accordingly:
21

22 1. On July 11, 2008, the Court heard oral argument on defendant's motion to
23 dismiss plaintiff's complaint/ motion for summary judgment and took the matter under
24 submission.

25 2. The initial case management conference in this matter is currently scheduled
26 for August 15, 2008, at 2:00 p.m.

27
28 Stipulation and [Proposed] Order Re:
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1 3. In the interest of economy, and so that the parties may discuss their
2 respective positions relating to initial disclosure, discovery and ADR with the benefit of
3 the Court's ruling on defendant's pending motion, the parties hereby stipulate and
4 request that the Court continue the currently scheduled case management conference
5 for forty nine (49) days.

6 4. The parties further stipulate and request that the Court correspondingly
7 continue the dates the parties are required to meet and confer and exchange their initial
8 disclosures. The proposed dates are as follows:

9 Case Management Conference: October 3, 2008, at 2:00 p.m.

10 Joint Case Management Statement: September 26, 2008

11 Initial Disclosures: September 26, 2008

12 Last Day to Meet and Confer: September 12, 2008.

13
14 Respectfully submitted,

15 **ROBOOSTOFF & KALKIN**

16
17 Dated: July 22, 2008

18 /s/
Scott Kalkin
Attorney for plaintiff

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20
21 **JONES DAY**

22
23 Dated: July 22, 2008

24 By: /s/
Katherine S. Ritchey
Attorneys for Defendant

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

By:

Judge of the United States District
Court for the Northern District of
California

Stipulation and [Proposed] Order Re:
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